



UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

JINGLIANG SU,
aka "James,"

Defendant.

CR No. 2:25-CR-00362-MRA

I N F O R M A T I O N

[18 U.S.C. § 371: Conspiracy to
Operate an Illegal Money
Transmitting Business;
18 U.S.C. § 982: Criminal
Forfeiture]

The United States Attorney charges:

[18 U.S.C. § 371]

A. INTRODUCTORY ALLEGATIONS

At times relevant to this Information:

1. Defendant JINGLIANG SU was a citizen of the People's
Republic of China ("PRC") and resided in the United Arab Emirates.

2. Co-Conspirator 1 was a citizen of the United States and
resided in Los Angeles, California.

1 3. Co-Conspirator 2 was a citizen of the United States and
2 resided in Los Angeles, California and Mexico City, Mexico.

3 4. Co-Conspirator 3 was a citizen of the PRC and St. Kitts and
4 Nevis and resided in the Kingdom of Cambodia, the United Arab
5 Emirates, and the PRC.

6 5. Axis Digital Limited ("Axis Digital") was an entity
7 incorporated under the laws of the Commonwealth of the Bahamas on or
8 about November 30, 2021.

9 6. "Bahamas Account #1" was an account at Deltec Bank and
10 Trust Limited ("Deltec Bank") in the Bahamas, opened by Axis Digital
11 on or about February 25, 2022.

12 7. B&C Commerce LLC ("B&C Commerce") was a shell company
13 registered with the California Secretary of State on or about January
14 21, 2022, with a principal address in San Gabriel, California.

15 8. Jimei Trading Inc. ("Jimei Trading") was a shell company
16 registered with the California Secretary of State on or about May 15,
17 2022, with a principal address in San Gabriel, California.

18 9. YXJ Trading Corporation ("YXJ Trading") was a shell company
19 registered with the California Secretary of State on or about July
20 30, 2022, with a principal address in Monterey Park, California.

21 10. YYJ Consulting Corporation ("YYJ Consulting") was a shell
22 company registered with the California Secretary of State on or about
23 August 25, 2022, with a principal address in Monterey Park,
24 California.

25 11. Sea Dragon Trading, LLC ("Sea Dragon Trading") was a shell
26 company registered with the California Secretary of State on or about
27 September 8, 2022, with a principal address in Alhambra, California.

28 12. SMX Beauty Inc. ("SMX Beauty") was a shell company

1 registered with the California Secretary of State on or about October
2 13, 2022, with a principal address in Monterey Park, California.

3 13. SMX Travel Inc. ("SMX Travel") was a shell company
4 registered with the California Secretary of State on or about October
5 13, 2022, with a principal address in Monterey Park, California.

6 14. Sea Dragon Remodel, Inc. ("Sea Dragon Remodel") was a shell
7 company registered with the California Secretary of State on or about
8 October 17, 2022, with a principal address in Vernon, California.

9 15. The virtual-currency wallet address beginning with TRteo
10 (the "TRteo Address") was a wallet that received transfers of virtual
11 currency converted from funds in Bahamas Account #1.

12 B. DEFINITIONS

13 16. "Digital currency" or "virtual currency" is currency that
14 exists only in digital form; it has some of the characteristics of
15 traditional money, but it does not have a physical equivalent.
16 Cryptocurrency, a type of virtual currency, is a network-based medium
17 of value or exchange that may be used as a substitute for traditional
18 currency to buy goods or services or exchanged for traditional
19 currency or other cryptocurrencies. USDT, or Tether, is a virtual
20 currency whose value is pegged to the U.S. dollar.

21 17. The term "spoofed" refers to domain spoofing, a process by
22 which cybercriminals seek to persuade victims that a web address or
23 email belongs to a legitimate and generally trusted company, when in
24 fact it links the user to a fraudulent site controlled by a
25 cybercriminal.

26 18. In "pig butchering" fraud schemes (a term derived from a
27 foreign-language phrase used to describe these crimes), scammers
28 encounter victims on dating services, social media, or through

1 unsolicited messages or calls, often masquerading as a wrong number.
2 Scammers initiate relationships with victims and slowly gain their
3 trust, eventually introducing the idea of making a business
4 investment using cryptocurrency. Victims are then directed to other
5 members of the scheme operating fraudulent cryptocurrency investment
6 platforms and applications, where victims are persuaded to make
7 financial investments. Once funds are sent to scammer-controlled
8 accounts, the investment platform often falsely shows significant
9 gains on the purported investment, and the victims are thus induced
10 to make additional investments. Ultimately, the victims are unable
11 to withdraw or recover their money, often resulting in significant
12 losses for the victims.

13 19. In "customer service" or "tech support" fraud schemes,
14 victims are contacted by fake customer service or technology support
15 representatives. Scammers often pretend to represent a prominent
16 company and contact the victim to alert them to a supposed infection
17 with a computer virus or false issue with the victim's computer or
18 other digital device. Scammers then take a variety of actions to
19 defraud the victim, including, but not limited to, the following: (a)
20 causing the victim to provide them with remote access to the victim's
21 digital devices to supposedly remediate the problem, (b) requesting
22 that funds be transferred to pay for assistance, and (c) advising the
23 victim to transfer money from accounts that are supposedly
24 compromised by the problem to accounts controlled by the scammer.

25 C. OBJECT OF THE CONSPIRACY

26 20. Beginning on an unknown date, but no later than on or about
27 November 2021, and continuing to in or about July 2023, in Los
28 Angeles County, within the Central District of California, and

1 elsewhere, defendant SU, with others known and unknown, knowingly
2 conspired and agreed to commit an offense against the United States,
3 namely, to operate an unlicensed money transmitting business, in
4 violation of 18 U.S.C. §§ 1960(b)(1)(B) and 1960(b)(1)(C).

5 D. THE MANNER AND MEANS OF THE CONSPIRACY

6 21. The object of the conspiracy was to be accomplished in
7 substance as follows:

8 Solicitation of Investment Fraud Victims

9 a. Unindicted co-conspirators would contact victims
10 directly through unsolicited social-media interactions, telephone
11 calls and messages, and online dating services.

12 b. Unindicted co-conspirators would gain the trust of
13 victims by establishing either professional or romantic relationships
14 with the victims. Unindicted co-conspirators would build these
15 relationships through interstate communications, including, but not
16 limited to, electronic messages sent via end-to-end encrypted
17 applications.

18 c. Unindicted co-conspirators would promote fraudulent
19 cryptocurrency investments to the victims after gaining the victims'
20 trust.

21 d. Unindicted co-conspirators would establish spoofed
22 domains and websites that resembled legitimate cryptocurrency trading
23 platforms.

24 e. In some executions of the scheme, unindicted co-
25 conspirators would fraudulently induce victims into investing in
26 cryptocurrency through these fraudulent and spoofed investment
27 platforms.

28 f. In other executions of the scheme, unindicted co-

1 conspirators would fraudulently induce victims into investing in
2 cryptocurrency by sending funds via wire transfer.

3 g. Unindicted co-conspirators would fraudulently
4 represent to victims that the victims' investments were appreciating
5 when, in fact, those funds had been converted by members of the fraud
6 scheme.

7 Solicitation of Customer Service and Tech Support Fraud Victims

8 h. Unindicted co-conspirators would fraudulently
9 represent to victims through interstate communications, including,
10 but not limited to, electronic messages and phone calls, that they
11 were from a customer service or technology support company.

12 i. Unindicted co-conspirators would fraudulently induce
13 victims to send funds via wire transfer or cryptocurrency trading
14 platforms to purportedly remediate a non-existent virus or other
15 false computer-related problem.

16 Operation of Unlicensed Money Transmitting Business

17 j. Co-conspirators would register dozens of U.S. shell
18 companies with the California Secretary of State and elsewhere,
19 including B&C Commerce, Jimei Trading, YXJ Trading, YYJ Consulting,
20 SMX Beauty, SMX Travel, Sea Dragon Trading, and Sea Dragon Remodel.

21 k. Co-conspirators would open bank accounts in the names
22 of various shell companies.

23 l. Co-conspirators would receive victim funds in U.S.
24 bank accounts established on behalf of shell companies and cause the
25 further transfer of victim funds to domestic and international bank
26 accounts.

27 m. Defendant SU and co-conspirators would monitor the
28 receipt and execution of interstate and international wire transfers

1 of victim funds, including to Bahamas Account #1.

2 n. Defendant SU and other co-conspirators would monitor
3 the conversion of victim funds to USDT and the subsequent
4 distribution of virtual currency to cryptocurrency wallets.

5 o. Defendant SU and co-conspirators would direct the
6 conversion of nearly all of the funds into USDT and the subsequent
7 transfer of cryptocurrency to the TRteo Address.

8 p. Defendant SU would receive a commission for the
9 transfer of victim funds to USDT and would distribute ledgers
10 detailing the profit-sharing arrangement.

11 q. Defendant SU and other co-conspirators would possess
12 fraudulent "Know Your Customer" ("KYC") documents associated with
13 these wire transfers.

14 r. Co-conspirators would cause wire transfers to be sent
15 through various intermediary bank accounts before reaching their
16 final beneficiary.

17 s. Defendant SU would receive victim funds in financial
18 accounts he directly controlled.

19 t. Defendant SU and other co-conspirators would
20 communicate with each other and coordinate acts in furtherance of the
21 conspiracy through encrypted messaging services.

22 E. OVERT ACTS

23 22. In furtherance of the conspiracy and to accomplish its
24 object, defendant SU, Co-Conspirators 1, 2, and 3, and others known
25 and unknown, on or about the dates set forth below, committed and
26 caused to be committed various overt acts, in the Central District of
27 California and elsewhere, including, but not limited to, the
28 following:

1 Overt Act No. 1: On June 8, 2022, defendant SU corresponded
2 on an encrypted messaging platform with co-conspirators about the
3 transfer of funds to Co-Conspirator 1 to open Bahamas Account #1.

4 Overt Act No. 2: On June 8, 2022, defendant SU transferred
5 approximately \$17,862 to Co-Conspirator 1 to facilitate the opening
6 of Bahamas Account #1.

7 Overt Act No. 3: On an unknown date but no later than July
8 10, 2022, defendant SU traveled to Phnom Penh, Cambodia, to meet with
9 co-conspirators regarding the operation of Bahamas Account #1 and the
10 transfer of USDT to the TRTeo Address.

11 Overt Act No. 4: On August 5, 2022, defendant SU corresponded
12 with Deltec Bank employees on an encrypted messaging platform and
13 confirmed that for future transactions, funds from Bahamas Account #1
14 should be converted to USDT and transferred to the TRteo Address.

15 Overt Act No. 5: On November 14, 2022, defendant SU informed
16 co-conspirators that he had completed the profit sharing and
17 subsequently sent a ledger detailing the commissions earned from bank
18 transfers into Bahamas Account #1 from numerous shell companies,
19 including Sea Dragon Trading, YXJ Trading, and YYJ Consulting.

20 Overt Act No. 6: On January 14, 2023, defendant SU sent co-
21 conspirators a ledger detailing the commissions earned from bank
22 transfers into Bahamas Account #1 from numerous shell companies.

23 Overt Act No. 7: On February 10, 2023, defendant SU sent co-
24 conspirators a ledger detailing the commissions earned from bank
25 transfers into Bahamas Account #1 from numerous shell companies.

26 Overt Act No. 8: On June 27, 2023, defendant SU became a
27 director of Axis Digital and a signatory on Bahamas Account #1 at
28 Deltec Bank.

FORFEITURE ALLEGATION

[18 U.S.C. § 982]

1. Pursuant to Rule 32.2(a) of the Federal Rules of Criminal Procedure, notice is hereby given that the United States of America will seek forfeiture as part of any sentence, pursuant to Title 18, United States Code, Section 982(a)(2), in the event of defendant's conviction of the offense set forth in this Information.

2. Defendant, if so convicted, shall forfeit to the United States of America the following:

(a) All right, title and interest in any and all property, real or personal, constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of the offense; and

(b) To the extent such property is not available for forfeiture, a sum of money equal to the total value of the property described in subparagraph (a).

3. Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b), defendant, if so convicted, shall forfeit substitute property, up to the total value of the property described in the preceding paragraph if, as the result of any act or omission of said defendant, the property described in the preceding paragraph, or any portion thereof: (a) cannot be located upon the exercise of due diligence; (b) has been transferred, sold to or deposited with a third party; (c) has been placed beyond the jurisdiction of the court; (d) has been

//

//

//

1 substantially diminished in value; or (e) has been commingled with
2 other property that cannot be divided without difficulty.

3 BILAL A. ESSAYLI
4 United States Attorney

5 

6 DAVID T. RYAN
7 Assistant United States Attorney
8 Chief, National Security Division

9 KHALDOUN SHOBAKI
10 Assistant United States Attorney
11 Chief, Cyber & Intellectual Property
12 Crimes Section

13 MAXWELL COLL
14 ALEXANDER S. GORIN
15 Assistant United States Attorneys
16 Cyber & Intellectual Property Crimes
17 Section

18 NISHA CHANDRAN
19 Assistant United States Attorney
20 Major Frauds Section

21 STEFANIE SCHWARTZ
22 TAMARA LIVSHIZ
23 Trial Attorneys
24 Computer Crime & Intellectual
25 Property Section
26
27
28